

PL Sum. J.

Ex. 043



Transcript of **Vincent Vittatoe**

Tuesday, May 3, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 115457

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ALSO PRESENT:

Colin Coughenour, Videographer
Beth Richardson, Juliana Mesa

1 A. I wasn't aware, but you can find out that
2 there were incidents that had occurred at the
3 properties, yes.

4 Q. You testified previously that Accor North
5 America was the corporate owner of Motel 6, correct?

6 A. At the time, yes.

7 Q. And while you were the security -- the
8 director of security and safety Accor also owned Red
9 Roof Inns, correct?

10 MR. ALLUSHI: Objection.

11 A. At which point in time? They came in at a
12 certain point in time.

13 Q. Sure. Accor acquired Red Roof Inns in 1999,
14 correct?

15 A. Yes, I believe that's correct. Yes, sir.

16 Q. And you joined -- or you became the director
17 in 1998, correct?

18 A. Yes. No. 1999.

19 Q. Thank you.

20 So pretty close in time?

21 A. Yes.

22 Q. When you became the director, Accor also owned
23 Red Roof Inns?

24 COURT REPORTER: I'm sorry. What was the
25 answer?

1 should be observing and reporting as well, correct?

2 A. You -- yes, you would think that he would.

3 Q. And then if you'll turn to page 10, item (p)

4 says [REDACTED]

5 [REDACTED]?

6 A. Yes, sir.

7 Q. [REDACTED]

8 [REDACTED]?

9 A. Yes, sir.

10 Q. What steps did you take to ensure that a
11 security contractor was upholding its obligations in a
12 services agreement with Red Roof?

13 A. A lot of the time it was based on conversation
14 with the property in regards to how the security was
15 working out, RDO conversation, or the dialogue with
16 security guard company, and again, if I go to a property
17 and look at the incident reports and see that they don't
18 meet my expectations, then I would have conversation
19 with the security guard companies.

20 Q. Is it fair to say that to identify issues with
21 security services being provided to Red Roof, Red Roof
22 employees at the location would have to bring that to
23 your attention?

24 A. Repeat the question. I'm sorry.

25 Q. Sure. Would it -- would it be fair to say

1 me.

2 Q. Let me rephrase. Exhibit 196 is a
3 November 29th, 2010, e-mail, correct?

4 A. November 29th, 2010, yes.

5 Q. And attached to that e-mail is a safety and
6 security presentation you prepared, correct?

7 MR. ALLUSHI: Objection to form.

8 A. It's a presentation that has my name on it.
9 Again, I've seen differences in this document, so I
10 cannot say that this is the same presentation I put
11 together.

12 Q. Did you alter your presentation in any way
13 during the three-year period you worked for Red Roof?

14 MR. ALLUSHI: Objection.

15 A. I don't remember.

16 Q. You don't remember making changes?

17 A. I don't remember -- I don't remember, but I
18 just know as I look through this document here that you
19 just gave me, there's some differences.

20 Q. When did you stop working for Red Roof Inns?

21 A. November 19th, before Thanksgiving that year,
22 so I want to say it was the 19th of November.

23 Q. Okay. When you stopped working for Red Roof
24 Inns, who assumed your position?

25 A. I don't know that. I wasn't there.

1 STATE OF TEXAS)

2 I, STEFANIE ANDREWS, Certified Shorthand Reporter
3 in and for the State of Texas, hereby certify to the
4 following:

5 That the witness, VINCENT VITTATOE, was duly sworn
6 by the officer and that the transcript of the oral
7 deposition is a true record of the testimony given by
8 the witness;

9 That the time used by counsel for the parties is as
10 follows:

11 Mr. Manoj S. Varghese - 04 Hours:09 Minutes
12 Mr. Adi Allushi - 00 Hours:06 Minutes
13 Mr. C. Shane Keith - 00 Hours:00 Minutes
14 Mr. Jonathan S. Tonge - 00 Hours:05 Minutes

15 Further, I am not a relative or employee of any
16 attorney of record in this cause, nor am I financially
17 or otherwise interested in the outcome of the action.

18 CERTIFIED by me on this the 16th day of May, 2022.

19 

20 STEFANIE ANDREWS, Texas CSR 5354
21 Expiration Date: 4/30/24

22 Trustpoint Alderson Reporting
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